

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**SUPERSEDING BILL OF INFORMATION FOR
THEFT OF GOVERNMENT FUNDS**

UNITED STATES OF AMERICA

v.

RAYMOND K. CUCCIA

* CRIMINAL NO. 2:08-cr-311

* SECTION: I(1)

* VIOLATION: 18 U.S.C. §641

* * *

The United States Attorney charges that:

Count 1

A. AT ALL MATERIAL TIMES HEREIN:

1. Prior to August and September of 2005 and through the present, the defendant, **RAYMOND K. CUCCIA**, resided at and used as his primary residence a home located at 2408 24th Street, Kenner, Louisiana 70062, in the Eastern District of Louisiana.

2. From on or about August 1986 to the present, the defendant, **RAYMOND K. CUCCIA**, also owned a camp or structure located at 4759 Pontchartrain Drive, Slidell, Louisiana 70458, in the Eastern District of Louisiana.

3. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused widespread damage to the Gulf Coast region of Louisiana, including the Slidell, Louisiana area.

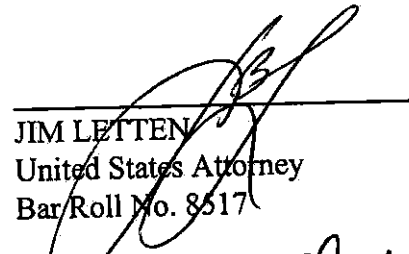
4. Pursuant to legislation passed by the Congress of the United States of America and signed by the President of the United States, funds were appropriated to the Department of Housing and Urban Development ("HUD") for a Community Development Block Grant ("CDBG") for Louisiana hurricane victims. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program ("LRHP"). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the LRHP.

5. One of the major requirements for receiving grant money from the LRHP was the damaged property must have been the primary residence of the applicant on August 29, 2005.

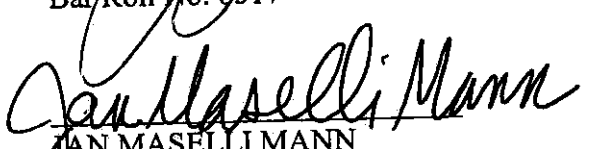
B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS

6. From on or about July 20, 2007 through December 27, 2007, in the Eastern District of Louisiana, the defendant, **RAYMOND K. CUCCIA**, did knowingly steal, purloin, and convert for his own use funds and money of the United States Department of Housing and Urban Development, a department and agency of the United States, namely, Community Development Block Grant funds provided through the Louisiana Road Home Program to which he knew he was not entitled, having

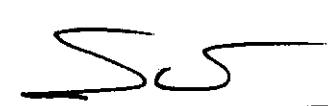
a value of approximately \$64,320.00; all in violation of Title 18, United States Code, Section 641.



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New Orleans, Louisiana
January 23, 2009